

September 28, 2018

Arthur Burbank
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Forest Service Intermountain Region
4350 South Cliffs Drive
Pocatello, ID 83204

Subject: Smoky Canyon Mine Remedial Investigation/Feasibility Study
Revised Feasibility Study Technical Memorandum #1:
Identification and Screening of Remedial Technologies

Dear Art,

Please find enclosed one hardcopy and one accompanying CD of the complete *Revised Feasibility Study Technical Memorandum #1: Identification and Screening of Remedial Technologies* (Revised FSTM#1) for the Smoky Canyon Remedial Investigation/Feasibility Study (RI/FS). The J.R. Simplot Company (Simplot) is submitting the enclosed document in accordance with the August 2009 Settlement Agreement/Consent Order.

This document has been revised in accordance with September 8, 2017 comments received from the Agencies on the March 2017 Revised Draft FSTM#1 and Simplot's responses to comments dated November 16, 2017. Agency comments dated April 12, 2018 were incorporated in this Revised FSTM#1 as outlined in Simplot's responses to comments dated June 6, 2018. Additional Agency comments dated August 31, 2018 were also incorporated as outlined in the responses to comments attached to this transmittal letter.

Chapter 5 has been reorganized as suggested in the Agency comments to analyze the various process options by media against overall effectiveness, implementability, and cost. The Applicable or Relevant and Appropriate Requirements (ARARs) and guidance To Be Considered (TBCs) are more specific and certain ARARs have been added or revised as suggested in the follow up comments. Appendix A provides the analysis for a proposed Preliminary Remediation Goal (PRG) for soil as discussed during various meetings with the Agencies.

Please contact me if there are questions regarding this submittal.

Sincerely,



Jeffrey Hamilton
Environmental Engineer



cc: (1 copy except as otherwise noted)
Arthur Burbank – USFS, 410 East Hooper, Soda Springs, ID 83276 (1 unbound copy)
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**Responses to Agency Comments (August 31, 2018) on
Simplot June 2018 Responses to Comments (April 2018) on
Simplot November 2017 Responses to Comments (November 2017)
Revised Draft FS Technical Memorandum #1 (March 2017)**

Specific Comments:

SC-1 Table 3-1, Page 4, State of Idaho Action-Specific ARARs: The following standards or requirements should also be included:

- 1) Idaho Uniform Environmental Covenants Act (Idaho Code §§55-3001 to 3015) for portions of the site on private lands.
- 2) Point Source Discharges (IDAPA 58.01.02.400-401). Provides limits and restrictions including possible limits on temperature and flow rates for point rate discharges.
- 3) Hazardous Deleterious Material Storage (IDAPA 58.01.02.800). Prohibits the storage, disposal, or accumulation of hazardous materials "adjacent to or in the immediate vicinity of state waters" without adequate measures and controls to ensure the materials will not enter state waters.

Response: The standards or requirements listed above have been added as ARARs, as shown in Table 3-1.

SC-2 Table 3-1, Page 5, State of Idaho Chemical-Specific ARARs: The Regional Screening Levels (RSLs) for tap water include values similar to the "Ground Water Quality Rule" (IDAPA 58.01.11) standards, included in Table 3-1, except for arsenic and chromium VI. Therefore, consider rephrasing under USEPA RSLs, site-specific comments: "RSLs are to be considered if groundwater or surface water is used as drinking water. These standards are only for carcinogen contaminants for which there are no maximum contaminant level goals (MCLGs) or maximum contaminant levels (MCLs) are established." For arsenic, IDAPA 58.01.11 should be considered.

Response: The text in the "site-specific comments" section for USEPA RSLs has been revised as suggested (see Table 3-2). IDAPA 58.01.11 has been added as a chemical-specific TBC for arsenic (See Table 3-2).

SC-3 Table 3-1, Page 5, Federal Chemical-Specific ARARs: Sediment Quality Assessment Guidelines (SQAGS), NOAA Freshwater Sediment Benchmarks, Proposed Selenium Benchmarks for Freshwater Sediment- none of these are federal standards, regulation or requirements. Therefore, they should not be considered as ARARs, but TBCs. The site-specific comments mention that any risk conclusions for selenium in aquatic environments should be based on concentrations in fish tissues and that tissue concentrations for fish should be considered as the threshold values for effects and potential cleanup. Site-specific selenium criterion for Hoopes Spring, Sage Creek, and Crow Creek near the Smoky Canyon Mine have been submitted and approved by DEQ. Although EPA approval for these selenium site-specific standards is pending, these site-specific standards should be used as a chemical-specific ARAR for sediments and protection of aquatic life until promulgation of the site-specific standards.

Response: The site-specific comments for SQAGS, NOAA Freshwater Sediment Benchmarks, and Proposed Selenium Benchmarks for Freshwater Sediment are listed as TBCs on Table 3-2. The site-specific comments have been revised as suggested in this comment to mention the SSSC (See Table 3-2). The SSSC has also been added as a chemical-specific ARAR for the State of Idaho (See Table 3-1).

SC-4 Table 3-1, Page 6, State of Idaho Action-Specific ARARs: IDAPA 20.03.02.140 and IDAPA 58 require the implementation of BMPs to protect existing water quality conditions and beneficial uses. Agencies recommend that the Idaho Department of Lands manual *Best Management Practice for Mining in Idaho* be listed as a TBC.

Response: The Idaho Department of Lands BMP Manual has been listed as a TBC (See Table 3-2).